

1 JAMES F. CLAPP (145814)  
jclapp@sdlaw.com  
2 JAMES T. HANNINK (131747)  
jhannink@sdlaw.com  
3 ZACH P. DOSTART (255071)  
zdostart@sdlaw.com  
4 DOSTART CLAPP HANNINK & COVENEY, LLP  
4370 La Jolla Village Drive, Suite 970  
5 San Diego, California 92122-1253  
Tel: 858-623-4200  
6 Fax: 858-623-4299

7 Attorneys for Plaintiff

8 ANGELA C. AGRUSA (SBN 131337)  
aagrusa@linerlaw.com  
9 ALLEN P. LOHSE (SBN 236018)  
alohse@linerlaw.com

10 LINER LLP  
11 1100 Glendon Avenue, 14 Floor  
Los Angeles, California 90024-3503  
Tel: 310-500-3500  
12 Fax: 310-500-3501

13 Attorneys for Defendant

14 UNITED STATES DISTRICT COURT  
15 SOUTHERN DISTRICT OF CALIFORNIA  
16

17 SASAN MIRKARIMI, individually and  
18 on behalf of all others similarly situated,

19 Plaintiff,

20 vs.

21 NEVADA PROPERTY 1 LLC, a  
Delaware limited liability company  
22 DBA THE COSMOPOLITAN HOTEL  
OF LAS VEGAS, and DOES 1-50,  
23 inclusive,

24 Defendant.

CASE NO. 12-CV-2160 BTM DHB

**NOTICE OF SETTLEMENT AND  
JOINT MOTION TO VACATE  
DISCOVERY AND SCHEDULING  
DEADLINES**

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1 On December 19, 2014, the Court entered an Order Granting Joint Motion to  
 2 Continue Deadlines to Permit Mediation. ECF No. 98. The mediation was held on  
 3 February 20, 2015, and the parties were able to reach a settlement of this action.  
 4 The parties are in the process of preparing a formal settlement agreement. The  
 5 parties anticipate that the formal settlement agreement will be finalized and that  
 6 Plaintiff will be able to file a motion for preliminary approval within approximately  
 7 sixty (60) days.

8 In view of the settlement, the parties request that the Court vacate all  
 9 currently pending deadlines, including but not limited to deadlines to file any joint  
 10 motions for determination of discovery disputes, the deadline of April 24, 2015 to  
 11 complete discovery relating to class certification, and the deadline of June 5, 2015  
 12 for Plaintiff to file his motion for class certification.

13  
 14 Dated: March 2, 2015

DOSTART CLAPP HANNINK &  
 COVENEY, LLP

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 16  
 17 s/ James F. Clapp

JAMES F. CLAPP

Attorneys for Plaintiff

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 19  
 20 Dated: March 2, 2015

LINER LLP

21  
 22 s/ Allen P. Lohse

ALLEN P. LOHSE

Attorneys for Defendant

**SIGNATURE CERTIFICATION**

Pursuant to Section 2(f)(4) of the Electronic Case Filing Administrative Policies and Procedures Manual, I hereby certify that the content of this document is acceptable to Allen P. Lohse, counsel for Defendant, and I have obtained his authorization to affix his electronic signature to this document.

Dated: March 2, 2015

DOSTART CLAPP HANNINK &  
COVENEY, LLP

s/ James F. Clapp

JAMES F. CLAPP

Attorneys for Plaintiff

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